IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:) Chapter 11
HORNBLOWER HOLDINGS LLC, et al., 1) Case No. 24-90061 (MI)
Debtors.) (Jointly Administered)

DEBTORS' AGENDA OF MATTERS SET FOR A HEARING ON MARCH 25, 2024 AT 8:00A.M. (PREVAILING CENTRAL TIME)

TO THE HONORABLE JUDGE ISGUR:

The above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") file this agenda for the hybrid hearing on **March 25, 2024 at 8:00 a.m.** (prevailing Central Time) before the Honorable Judge Marvin Isgur at the United States Bankruptcy Court for the Southern District of Texas, Courtroom 404, 515 Rusk Street, Houston, Texas 77002:

A. Motion:

1. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief [Docket No. 35].

Related Documents:

- a. Declaration of Jonathan Hickman in Support of Chapter 11 Petitions and First Day Motions [Docket No. 25].
- b. Declaration of Matthew Scheidemann in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Certain Prepetition

The last four digits of Debtor Hornblower Holdings LLC's tax identification number are 6035. Due to the large number of debtor entities in these chapter 11 cases which are being jointly administered, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://omniagentsolutions.com/Hornblower. The location of the Debtors' service address for purposes of these chapter 11 cases is: Pier 3 on The Embarcadero, San Francisco, CA 94111.

- Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 36].
- c. Sealed Document Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief [Docket No. 37].
- d. Notice of Final Hearing [Docket No. 192]
- e. Notice of Adjournment of Final Hearing [Docket No. 245].
- f. Debtors' Witness and Exhibit List For Hearing on March 25, 2024 [Docket No. 307].
- g. Debtors' Statement Regarding Proposed Final DIP Order and Resolution of All Objections Thereto [Docket No. 314].
- h. Statement of the Official Committee of Unsecured Creditors Regarding (1) Debtors' Emergency Motion for Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief and (2) Disclosure Statement for Joint Chapter 11 Plan of Reorganization of Hornblower Holdings LLC and its Debtor Affiliates [Docket No. 315].
- i. Certificate of Counsel Regarding Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief [Docket No. 318].

The following objections have been resolved between the parties and withdrawn by the objectors:

- a. Objection of Frances A. Poplau and Mary F. Hudalla to Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Postpetition Financing and (B) Use Cash Collateral, (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief [Docket No. 240].
- b. Argonaut Insurance Company's Limited Objection to the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Postpetition Financing and

(B) Use Cash Collateral, (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief [Docket No. 253].

Status: The matter is going forward on an uncontested basis.

Dated: March 23, 2024

Respectfully submitted,

By: /s/ John F. Higgins

PORTER HEDGES LLP

John F. Higgins (TX Bar No. 09597500)
M. Shane Johnson (TX Bar No. 24083263)
Megan Young-John (TX Bar No. 24088700)
1000 Main St., 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 226-6248
jhiggins@porterhedges.com
sjohnson@porterhedges.com
myoung-john@porterhedges.com

– and –

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

Paul M. Basta (admitted *pro hac vice*) Jacob A. Adlerstein (admitted pro hac vice) Kyle J. Kimpler (admitted *pro hac vice*) Sarah Harnett (admitted *pro hac vice*) Neda Davanipour (admitted *pro hac vice*) Kyle R. Satterfield (admitted pro hac vice) 1285 Avenue of the Americas New York, New York 10019 Telephone: (212) 373-3000 Facsimile: (212) 757-3990 pbasta@paulweiss.com jadlerstein@paulweiss.com kkimpler@paulweiss.com sharnett@paulweiss.com ndavanipour@paulweiss.com ksatterfield@paulweiss.com

Proposed Counsel to the Debtors and the Debtors in Possession

Certificate of Service

I certify that on March 23, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins
John F. Higgins